

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

DANIEL LOVELACE and
HELEN LOVELACE, Individually, and as Parents of
BRETT LOVELACE, deceased,

Plaintiffs,

VS.

NO.: 2:13-cv-02289 JPM-dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and,
MARK P. CLEMONS,

Defendants.

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION OF
DEFENDANTS, PEDIATRIC ANESTHESIOLOGISTS, P.A. AND BABU RAO
PAIDIPALLI, M.D., FOR QUALIFIED PROTECTIVE ORDER**

Come the Plaintiffs, Daniel Lovelace and Helen Lovelace, Individually, and as Parents of Brett Lovelace, deceased, by counsel, and for their Motion for Extension of Time to Respond to Motion of Defendants, Pediatric Anesthesiologists, P.A. and Babu Rao Paidipalli, M.D., for Qualified Protective Order [D.E. 59], would state:

1. Counsel for Plaintiffs currently has several briefs in other courts due at this time and is pressed for time to respond to all of same in a thorough and timely manner.
2. Under these circumstances, counsel respectfully requests additional time until January 7, 2014 within which to respond to the above cited pleadings.
3. Extensions of time should be freely granted in the interest of justice.
4. Opposing counsel has no objection to the relief requested.

WHEREFORE, PREMISES CONSIDERED, PLAINTIFF PRAYS for the relief requested herein.

Respectfully submitted,

HALLIBURTON & LEDBETTER

s/Mark Ledbetter
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via the Court's ECF filing system

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This 12th day of December, 2013.

s/Mark Ledbetter
MARK LEDBETTER, Certifying Attorney